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Attorneys for Plaintiff
WALTER JEFFERSON

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

WALTER JEFFERSON,

Plaintiff,

v.

THE CITY OF FREMONT, FREMONT
TENNIS CENTER, JEFF GONCE, and Does 1
through 10, inclusive,

Defendants.

Case No. 3:12-cv-00926 EMC

**STIPULATION OF COUNSEL AND
[PROPOSED] ORDER TO EXTEND DEADLINE
FOR DISPOSITIVE MOTIONS AND NON-
EXPERT DISCOVERY CUT-OFF**

Hon. Edward M. Chen

1 Defendants City of Fremont, a municipal public entity on behalf of itself and the Fremont Tennis
2 Center and Jeff Gonce, and Plaintiff Walter Jefferson hereby submit the following Stipulation and
3 Proposed Order extending the time for dispositive motions and non-expert discovery cut-off.

4 WHEREAS on July 12, 2013, the Court issued a Case Management and Pre-Trial Order for Jury
5 Trial ("Order"). Pursuant to the Order, the parties were to complete non-expert discovery by March 20,
6 2014, and the last day for dispositive motions to be heard was June 12, 2014.

7 WHEREAS on February 20, 2014, at the Joint Status Conference, the parties notified the Court
8 that plaintiff intended to take the deposition of Jeff Gonce and that Mr. Gonce's deposition could not be
9 completed before the March 20, 2014 discovery cut-off deadline;

10 WHEREAS the parties have met and conferred and agreed that plaintiff will take the deposition
11 of Jeff Gonce in Reno on May 28, 2014. The defendants also anticipate taking the depositions of Paul
12 Concepcion and Sarah Robinson before May 28, 2014;

13 WHEREAS the parties have agreed that the last day for dispositive motions to be heard should be
14 moved to July 31, 2014, in order to complete the above depositions and allow sufficient time to brief said
15 motions.

16 IT IS HEREBY STIPULATED AND AGREED AS FOLLOWS:

17 The time to complete non-expert discovery shall be extended to May 30, 2014. The last day for
18 dispositive motions to be heard shall be extended to July 31, 2014 at 1:30 p.m.

19 SO STIPULATED.

20
21 Dated: March 20, 2014

BERTRAND, FOX & ELLIOT

22
23 By: /s/ Ilana Kohn

24 Gregory M. Fox

25 Ilana Kohn (Of Counsel)

26 Attorneys for Defendants

27 CITY OF FREMONT, FREMONT TENNIS

28 CENTER, JEFF GONCE, JOE GRECH,

ANNABELLE HOLLAND and KELLY KING

1 Dated: March 25, 2014

MORGAN LOGAN LAW GROUP

2
3 By: /s/

4 Angela L. Morgan

5 Attorney for Plaintiff

6 WALTER JEFFERSON
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CERTIFICATE OF CONCURRENCE

I, Ilana Kohn, declare:

Pursuant to Local Rule No. 5-1(i)(3) I have obtained the concurrence of all other parties in the filing of this document, which shall serve in lieu of their signatures on the documents.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration is executed at San Francisco, California, on March 20, 2014.

/s/
ILANA KOHN, Esq.

ORDER

Pursuant to the above Stipulation of the parties by and through their respective counsel of record, it is hereby ORDERED as follows:

1. The time to complete non-expert discovery shall be extended to May 30, 2014.
2. The last day for dispositive motions to be heard shall be extended to July 31, 2014 at 1:30 p.m.

IT IS SO ORDERED.

Dated: March 26, 2014


EDWARD M. CHEN
UNITED STATES DISTRICT COURT JUDGE